**Exhibit J** 

From: Scott Rubman <scottrubman@hotmail.com>

Sent: Tuesday, January 21, 2025 9:47 AM

**To:** Coleman, Keisha

**Subject:** Re: TIME-SENSITIVE: Carril/Lifschitz Divorce - Schwab Accounts

### **▲ EXTERNAL**

Keisha first and foremost I am not Martin Lifschitz's attorney. I know nothing about the divorce nor anything about Ms. Dolores Carril's unfounded allegations. They are mere conclusions nothing else and fail to establish any rights of ownership in the account holders name. Therefore there is no dispute nor need for Schwab to be a neutral stakeholder.

I represent 3k and have presented documentation regarding the wrongful retention of its account.

# Get Outlook for iOS

From: Coleman, Keisha <colemank@ballardspahr.com>

**Sent:** Tuesday, January 21, 2025 4:27:39 PM **To:** Scott Rubman <scottrubman@hotmail.com>

Subject: RE: TIME-SENSITIVE: Carril/Lifschitz Divorce - Schwab Accounts

Scott,

While I appreciate the additional documents, Schwab simply cannot weigh the merits of the parties' conflicting statements and demands. Please discuss the matter with her attorney and let me know if you can work something out.

# Regards, Keisha

# Keisha O. Coleman Ballard Spahr LLP 999 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-4421 Direct 678.420.9320 Fax 678.420.9301 Mobile 770.833.5289 colemank@ballardspahr.com www.ballardspahr.com

From: Scott Rubman <scottrubman@hotmail.com>

Sent: Tuesday, January 21, 2025 10:22 AM

To: Coleman, Keisha <colemank@ballardspahr.com>

Subject: Re: TIME-SENSITIVE: Carril/Lifschitz Divorce - Schwab Accounts

## **▲ EXTERNAL**

In furtherance of documentation as to the improper restriction of my client's account, I attach herewith correspondence from the Director of 3K Investment & Holding , S.A. as well as confirmation that Dolores Carril is no longer an authorized agent.

Scott A. Rubman, Esq. New York - Buenos Aires - Paris

Tel: +1.954.914.3240

From: Coleman, Keisha <colemank@ballardspahr.com>

Sent: Friday, January 17, 2025 12:52 PM

Cc: Scott Rubman <scottrubman@hotmail.com>

Subject: TIME-SENSITIVE: Carril/Lifschitz Divorce - Schwab Accounts

Ms. Carril,

Charles Schwab has retained Ballard Spahr LLP in connection with the above-referenced matter. Please direct all further communications regarding this matter to my attention.

I write in regard to your August 23, 2024 letter (copy attached), in which you advised Schwab that you and Martin Dario Lifschitz are engaged in a divorce proceeding pending in Argentina. In your August 23 letter, you demanded that Schwab restrict all accounts maintained in the names of you and/or Mr. Lifschitz or in the name of Fraival LLC.

I understand that, following the receipt of such letter, Schwab restricted 2 accounts: (1) a joint brokerage account maintained in the names of you and Mr. Lifschitz, as joint tenants, containing \$26.94; and (2) a corporate brokerage account maintained in the name of 3K Investments & Holding S.A. (the "3K Investments Account").

Schwab's records currently identify both you and Mr. Lifschitz as authorized agents on the 3K Investments account, with Mr. Lifshitz identified as the primary contact. However, I understand from Mr. Lifschitz's attorney (copied here) that you sold your shares in 3K Investments and are no longer an owner of that company.

Please confirm that Schwab should remove you as an authorized agent from the 3K Investment account.

Additionally, I do not presently see a basis for continuing to maintain a restriction on the 3K Investment account. If you have a court order stating that this particular account should be restricted in connection with the divorce, please send it to me by 6 pm ET next Wednesday, January 22, 2025. I will review whatever you send. However, based on the limited information provided to date, I do not see a basis for continuing to restrict this corporate account.

Regards, Keisha

# Keisha O. Coleman Ballard Spahr

999 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309-4421 678.420.9320 DIRECT 678.420.9301 FAX

770.833.5289 MOBILE | colemank@ballardspahr.com **VCARD** 

Case 4:25-cv-00112-P Document 1-11 Filed 02/07/25 www.ballardspahr.com Page 4 of 4 PageID 278